

Attachment 3:

**Local Television Ownership and Market
Concentration Study**

Local Television Ownership and Market Concentration Study

Purpose:

The purpose of this study is to analyze the effect of recent changes in television station ownership rules on ownership diversity by comparing television station ownership in 1993 to 2001. In addition, this study also analyzed whether changes in independent ownership of television stations within a local market has led to greater concentration of market power during that time period.

Design and Methodology:

Using data from BIA Financial Network* as well as information provided in the 1994 and 2001 Broadcasting & Cable Yearbooks*, this study incorporates a cross sampling of 10 of the 210 local TV markets listed in the 2001 BIA database* comparing changes in ownership and market share concentration from 1993 to 2001. Specifically, the BIA sources are based on data from "November, 1993" and "July, 2001."

The TV markets in this study were grouped by size as either large, mid-level or small as measured by their Designated Market Area (DMA).** The three large markets used in the study followed with their Designated Market Area in parentheses are: New York, NY (1), Los Angeles, CA (2) and Charlotte-Gastonia-Rock Hill (28). The four mid-level markets are: Birmingham, AL (39), Lexington-Fayette, KY (66), Portland, ME (79) and Tyler-Longview, TX (108). Finally, the three small markets are: Fargo, ND (120), Billings, MT (169), and Rapid City, SD (175).

For purposes of the study, TV stations were categorized by ownership and presented in table format. An additional table for each market is also presented which lists the top four owners in terms of their individual and collective market shares. Market share is defined by the Local Commercial Share.***

Notes:

Because of changes to the marketplace since the 2001 BIA television data was published as well as the expansion of some DMAs** from 1993 to 2001, modifications have been made to reflect these changes. For instance, the 2001 BIA data does not reflect the recent mergers between Fox Television and News Corp as well as between NBC/GE and Telemundo Group Inc. Thus the listed data both for News Corp and Telemundo Group Inc. have been incorporated into the data for Fox Television and NBC/GE respectively. As well, KCPM (channel 27) was excluded from the "2001 (Calls/Ch)" column in Fargo, ND because it is no longer on the air.

As an example of an expanded DMA from 1993 to 2001, station WCFT-TV (channel 33) has been excluded from the "2001 (Calls/Ch)" column for Birmingham, AL. The 2001 DMA for Birmingham was expanded from the 1993 DMA to encompass Tuscaloosa County where WCFT-TV is based. Additionally, "Low Power" stations as well as any station owned by a "Local Cable Station" were similarly excluded from the analysis.

Finally, the first edition of *Investing in Television 1994* omits mention of some stations which were in existence at the time of publication and whose boundaries are subsequently encompassed in the 2001 boundaries. The stations are: KSTV (channel 57) in Los Angeles, CA, WUNE-TV (channel 17) in Charlotte, NC, WJSU (channel 40) and WTJP (channel 60) in Birmingham, AL and KOUS (channel 4) in Billings, MT. This data was reconciled by relying on the third edition of the series.¹

¹ *Investing in Television 1994*, BIA Financial Network, Inc. (3rd ed. 1994).

* Source: *Investing in Television 1994*, BIA Financial Network, Inc. (1st ed. 1994); *Investing in Television 2001*, BIA Financial Network, Inc. (3rd ed. 2001); *Broadcasting & Cable Yearbook 1994*, R.R. Bowker A Reed Reference Publishing Company. (Vol. 1. 1993); *Broadcasting & Cable Yearbook 2001*, Bowker. (2001).

**DMA (Designated Market Area) Rank is a measurement based on the number of television households in the specific market.

***The Local Commercial Share is the average share for the prior 12 months adjusted for lost viewing to out-of-market, cable channels and non-commercial stations.

+Denotes a noncommercial station

Television Station Ownership in New York City, NY: 1993 versus 2001 (2001 DMA Rank: 1)**

1993 (Calls/Ch)	Owner	2001 (Calls/Ch)
WCBS (2)	CBS TV Stations Div	WCBS-TV (2)
WNBC (4)	NBC/GE	WNBC (4) WNJU (47)
WNYW (5)	Fox Television/ News Corp	WNYW (5) WWOR-TV (9)
WABC (7)	ABC Inc	WABC-TV (7)
WPIX (11)	Tribune Bestg Co	WPIX (11)
WTBY (54)	Trinity Bestg Ntwk	WTBY (54)
WMBC (63)	Mountain Bestg Corp	WMBC-TV (63)
+WNET (59)	Educ Bestg Corp	+WNET (13)
+WLIW (21)	Long Island ETV Inc	+WLIW (21)
+WNYE (25)	Board of Educ NYC	+WNYE-TV (25)
	CT Public TV & Radio	+WEDW (49)
+WNJM (50)	NJ Pub Bestg	+WNJN (50)
+WNJB (58)		+WNJB (58)
+WFME (66)	Family Stations Inc	+WFME-TV (66)
	Shop At Home Inc	WSAH (43)
	WLNY Inc	WLNY (55)
	WRNN-TV	WRNN-TV (62)
	Paxson Comm Corp	WPXN-TV (31)
	Univision Comm Inc	WXTV (41) WHSI-TV (67) WHSE-TV (68)
WWOR (9)	BHC Communications	
WNJU (47)	Telemundo Group Inc	
WXTV (41)	Perenchio Television	
WHA1 (43)	Bridgeways Comm	
WLIG (55)	Trexar Corp	
WTZA (62)	WTZA-TV Associates	
WHSI (67)	Silver King Comm Inc	
WHSE (68)		
+WNYC (31)	City of NY Municipal	
+WEDW (49)	Conn Educ Telecomm	

Market Ownership

1993	
# of Stations:	# of Independent Owners:
23	22

2001	
# of Stations:	# of Independent Owners:
23	18

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Top 4 Local Commercial Share Owners

1993	
Owner	Avg LCS
1. ABC Inc	23%
2. NBC/GE	18%
3. CBS TV Stations Div	17%
4. Fox Television	13%
4. Tribune Bcstg Co	13%
TOTAL	71% (counting only the first four percentages listed)

2001	
Owner	Avg LCS
1. ABC Inc	22%
2. NBC/GE	21%
3. Fox Television	20%
4. Tribune Bcstg Co	15%
TOTAL	78%

* Source: Investing in Television 1994, BIA Financial Network, Inc. (1st ed. 1994); Investing in Television 2001, BIA Financial Network, Inc. (3rd ed. 2001); Broadcasting & Cable Yearbook 1994, R.R. Bowker A Reed Reference Publishing Company. (Vol. 1. 1993); Broadcasting & Cable Yearbook 2001, Bowker. (2001).

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Television Station Ownership in Los Angeles, CA: 1993 versus 2001 (2001 DMA Rank: 2)**

1993 (Calls/Ch)	Owner	2001 (Calls/Ch)
KCBS (2)	CBS TV Stations Div	KCBS-TV (2)
KNBC (4)	NBC/GE	KNBC (4) KWHY-TV (22) KVEA (52)
KTLA (5)	Tribune Bestg Co	KTLA-TV (5)
KABC (7)	ABC Inc	KABC-TV (7)
KTTV (11)	Fox Television/ News Corp	KTTV (11) KCOP (13)
KTCN (40)	Trinity Bestg Ntwk	KTCN-TV (40)
+KVCR (24)	SB Comm College Dist	+KVCR-TV (24)
-KCET (28)	Community TV of S CA	+KCET (28)
-KOCE (50)	Coast Comm Col Dist	+KOCE (50)
+KLCS (58)	LA United Schl Dist	+KLCS (58)
	Young Bestg Inc	KCAL (9)
	International Media	KSCI (18)
	Paxson Comm Corp	KPXN (30)
	KVMD Acquisition	KVMD (31)
	Univision Comm Inc	KMEX-TV (34) KHSC-TV (46)
	RPVB Lender Inc	KXLA (44)
	Pappas Telecasting	KAZA-TV (54)
	Golden Orange Bestg	KDOC (56)
	Entravision Holdings	KJLA (57) KHIZ (64)
	Liberman Bestg Inc	KRCA (62)
KVEA (52)	Telemundo Group Inc	
KCAL (9)	Walt Disney Co	
KCOP (13)	United Television	
KSCI (18)	Beindorf & Headley	
KWHY (22)	Harriscopie, et al	
KZKI (30)	Telemundo Group Inc	
KVMD (31)	Univision Comm Inc	
KMEX (34)	Perenchio Television	
KRPA (44)	Rancho Palos Verdes	
KHSC (46)	Silver King Comm Inc	
KDOC (56)	Boone, Pat, et al	
KSTV (57)	Costa de Oro TV	
KBBL (59)	Riklis Bestg Corp	
KRCA (62)	Fouce Amusement	
KHIZ (64)	Sunbelt TV Inc	
+KEEF (68)	Black TV Workshop	

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Market Ownership

1993

# of Stations:	# of Independent Owners:
26	26

2001

# of Stations:	# of Independent Owners:
25	20

Top 4 Local Commercial Share Owners

1993

Owner	Avg LCS
1. ABC Inc	20%
2. NBC/GE	16%
3. CBS TV Stations Div	13%
3. Fox Television	13%
4. Tribune Bestg Co	10%
4. United Television	10%
TOTAL	62% (counting only the first four percentages listed)

2001

Owner	Avg LCS
1. NBC/GE	23%
2. ABC Inc	19%
2. Fox Television	19%
3. CBS TV Stations Div	10%
3. Univision Comm Inc	10%
4. Young Bestg Inc	8%
TOTAL	71% (counting only the first four percentages listed)

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Television Station Ownership in Charlotte, NC: 1993 versus 2001 (2001 DMA Rank: 28)**

1993 (Calls/Ch)	Owner	2001 (Calls/Ch)
WBTV (3)	Jefferson-Pilot Comm	WBTV (3)
WSOC (9)	Cox Broadcasting	WSOC-TV (9) WAXN (64)
WHKY (14)	Long Family Ptnrshp	WHKY-TV (14)
WCCB (18)	Bahakel Comm	WCCB (18)
	Belo Corp	WCNC-TV (36)
WJZY (46)	Capitol Bestg Co	WJZY (46) WWWB (55)
+WUNE-TV (17)	University of NC	+WUNE-TV (17)
+WUNG (58)		+WUNG-TV (58)
+WNSC (30)	SC ETV Commission	+WNSC-TV (30)
+WTVI (42)	Char-Meck Pub Bestg	+WTVI (42)
WCNC (36)	Providence Journal	
WFVT (55)	Family Fifty Five	
WKAY (64)	Community Action Com	

Market Ownership

1993	
# of Stations:	# of Independent Owners:
12	11

2001	
# of Stations:	# of Independent Owners:
12	9

Top 4 Local Commercial Share Owners

1993	
Owner	Avg LCS
1. Jefferson-Pilot Comm	33%
2. Cox Broadcasting	30%
3. Capitol Bestg	13%
3. Providence Journal	13%
4. Bahakel Comm	12%
TOTAL	89%(counting only the first four percentages listed)

2001	
Owner	Avg LCS
1. Cox Broadcasting	34%
2. Jefferson-Pilot Comm	23%
3. Capitol Bestg	16%
4. Belo Corp	15%
n/a	n/a
TOTAL	88%

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Television Station Ownership in Birmingham, AL: 1993 versus 2001 (2001 DMA Rank: 39)**

1993 (Calls/Ch)	Owner	2001 (Calls/Ch)
	Fox Television	WBRC-TV (6)
	NBC/GE	WVTM-TV (13)
	Media General	WIAT (42)
	Paxson Comm Corp	WPXH (44)
	Trinity Bestg Ntwk	WTJP (60)
	TV Alabama Inc	WJSU (40)
+WCIQ (7)	AL ETV Comm	+WCIQ (7)
+WBIQ (10)		+WBIQ-TV (10)
WTTO (21)	Sinclair Best Group	WTTO (21)
		WABM (68)
		WDBB (17)
WJSU (40)	Osborn Comm	
WTJP (60)	All-American TV, Inc.	
WBRC (6)	Great American Bestg	
WVTM (13)	KTVI Argyle Inc	
WBMG (42)	Park Communications	
WABM (68)	Krypton Bestg Corp	
WNAL (44)	Fant Broadcasting	

Market Ownership

1993	
# of Stations:	# of Independent Owners:
10	9

2001	
# of Stations:	# of Independent Owners:
11	8

Top 4 Local Commercial Share Owners

1993	
Owner	Avg LCS
1. Great American Bestg	40%
2. KTVI Argyle Inc	27%
3. Sinclair Best Group	19%
4. Park Communications	14%
TOTAL	100%

2001	
Owner	Avg LCS
1. Fox Television	30.38
2. Sinclair Best Group	24.05
3. NBC/GE	22.78
4. Media General	18.99
TOTAL	96.20%

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Television Station Ownership in Lexington, KY: 1993 versus 2001 (2001 DMA Rank: 66)**

1993 (Calls/Ch)	Owner	2001 (Calls/Ch)
WKYT (27)	Gray Communications	WKYT-TV (27)
WYMT (57)		WYMT-TV (57)
WLJC (65)	Hour of Harvest Inc	WLJC-TV (65)
+WKSO (29)	KY Authority Educ TV	+WKSO-TV (29)
+WKHA (35)		+WKHA (35)
+WKMR (38)		+WKMR (38)
+WKLE (46)		+WKLE (46)
	Evening Post Publishg	WLEX-TV (18)
	Media General	WTVQ-TV (36)
	Sinclair Bcst Group	WDKY-TV (56)
	Paxson Comm Corp	WAOM (67)
WAGV (44)	Living Faith Minstrs	
WAOM (67)	Garcia Comm	
WLEX (18)	Bank One, Lexington	
WTVQ (36)	Park Communications	
WDKY (56)	Superior Comm Group	

Market Ownership

1993	
# of Stations:	# of Independent Owners:
12	5

2001	
# of Stations:	# of Independent Owners:
11	7

Top 4 Local Commercial Share Owners

1993	
Owner	Avg LCS
1. Gray Communications	38%
2. Park Communications	26%
3. Bank One, Lexington	22%
4. Superior Comm Group	10%
TOTAL	96%

2001	
Owner	Avg LCS
1. Gray Communications	42%
2. Media General	25%
3. Evening Post Publishg	21%
4. Sinclair Bcst Group	12%
TOTAL	100%

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Television Station Ownership in Portland-Auburn, ME: 1993 versus 2001 (2001 DMA Rank: 79)**

1993	Owner	2001
	Gannett Co Inc	WCSH (6)
	WMTW Bestg Grp	WMTW-TV (8)
	Sinclair Best Group	WGME-TV (13)
	Paxson Comm Corp	WMPX-TV (23)
	KB Prime Media LLC	WPME (35)
	Pegasus Comm Corp	WPXT (51)
WCSH (6) +WCBB (10) +WMEA (26)	Maine Public Bestg	+WCBB (10) +WMEA-TV (26)
WMTW (8)	Harron Comm Corp	
WGME (13)	Guy Gannett Bestg	
WWLA (35)	New England TV Inc	
WPXT (51)	Bride, John. W, et al	

Market Ownership

1993	
# of Stations:	# of Independent Owners:
7	5

2001	
# of Stations:	# of Independent Owners:
8	7

Top 4 Local Commercial Share Owners

1993	
Owner	Avg LCS
1. Maine Bestg System	34%
2. Guy Gannett Bestg	33%
3. Harron Comm Corp	26%
4. Bride, John. W, et al	7%
TOTAL	100%

2001	
Owner	Avg LCS
1. Gannett Co Inc	32%
2. Sinclair Best Group	30%
3. WMTW Bestg Grp	23%
4. Pegasus Comm Corp	9%
TOTAL	94%

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Television Station Ownership in Tyler-Longview, TX: 1993 versus 2001 (2001 DMA Rank: 108)**

1993 (Calls/Ch)	Owner	2001 (Calls/Ch)
	Cosmos Bestg	KLTV (7) KTRE (9)
	White Knight Bestg	KFXK (51)
	Comm Corp of America	KETK-TV (56) KLSB-TV (19)
KFXK (51)	Warwick Comm Inc	
KLTV (7) KTRE (9)	Civic Communications	
KETK (56) KLSB (19)	Lone Star Bestg	

Market Ownership

1993	
# of Stations:	# of Independent Owners:
5	3

2001	
# of Stations:	# of Independent Owners:
5	3

Top 4 Local Commercial Share Owners

1993	
Owner	Avg LCS
1. Civic Communications	65%
2. Lone Star Bestg	22%
3. Warwick Bestg Co	13%
4. n/a	n/a
TOTAL	100%

2001	
Owner	Avg LCS
1. Cosmos Bestg	60%
2. Comm Corp of America	24%
3. White Knight Bestg	13%
4. n/a	n/a
TOTAL	97%

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Television Station Ownership in Fargo-Valley City, ND: 1993 versus 2001 (2001 DMA Rank: 120)**

1993 (Calls/Ch)	Owner	2001 (Calls/Ch)
WDAY (6) WDAZ (8)	Forum Publishing Co	WDAY-TV (6) WDAZ-TV (8)
KVRR (15) KJRR (7) KBRR (10) KNRR (12)	Red River Bcst Co	KVRR (15) KJRR (7) KBRR (10) KNRR (12)
	Catamount Bcst Group	KXJB-TV (4)
	Smith Bestg Group	KVLY-TV (11)
+KGFE (2) +KFME (13) +KJRE (19)	Prairie Public Bestg	+KGFE (2) +KFME (13) +KJRE (19)
KTHI (11)	Morgan Murphy Stns	
KXJB (4)	Barnstuble Group	

Market Ownership

1993

# of Stations:	# of Independent Owners:
11	5

2001

# of Stations:	# of Independent Owners:
11	5

Top 4 Local Commercial Share Owners

1993

Owner	Avg LCS
1. Barnstuble Group	34%
2. Forum Publishing Co	30%
3. Morgan Murphy Stns	26%
4. Red River Bcst Corp	11%
TOTAL	100%

2001

Owner	Avg LCS
1. Forum Publishing Co	32%
2. Catamount Bestg Group	28%
3. Smith Bestg Group	27%
4. Red River Bcst Corp	12%
TOTAL	99%

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Television Station Ownership in Billings, MT: 1993 versus 2001 (2001 DMA Rank: 169)**

1993 (Calls/Ch)	Owner	2001 (Calls/Ch)
KTVQ (2)	Evening Post Publishg	KTVQ (2)
	Glendive Bcstg Corp	KYUS-TV (3)
	Wolf Mtn Bcstg Inc	KHMT (4)
	Quorum Bcstg Co	KSVI (6)
KULR (8)	Dix Communications	KULR-TV (8)
KSVI (6)	Big Horn Comm Inc	
KYUS (3)		
KOUS (4)	Nat'l Indian Media	

Market Ownership

1993	
# of Stations:	# of Independent Owners:
5	4

2001	
# of Stations:	# of Independent Owners:
5	5

Top 4 Local Commercial Share Owners

1993	
Owner	Avg LCS
1. Evening Post Publishg	50%
2. Dix Communications	28%
3. Big Horn Comm Inc	22%
4. n/a	n/a
TOTAL	100%

2001	
Owner	Avg LCS
1. Evening Post Publishg	44%
2. Dix Communications	27%
3. Quorum Bcstg Co	19%
4. Wolf Mtn Bcstg Inc	10%
TOTAL	100%

* Source: Investing in Television 1994, BIA Financial Network, Inc. (1st ed. 1994); Investing in Television 2001, BIA Financial Network, Inc. (3rd ed. 2001); Broadcasting & Cable Yearbook 1994, R.R. Bowker A Reed Reference Publishing Company. (Vol. 1. 1993); Broadcasting & Cable Yearbook 2001, Bowker. (2001).

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Television Station Ownership in Rapid City, SD: 1993 versus 2001 (2001 DMA Rank 175)**

1993 (Calls/Ch)	Owner	2001 (Calls/Ch)
KQTA (3) KHSD (11) KSGW (12)	Duhamel Bestg	KOTA-TV (3) KHSD-TV (11) KSGW-TV (12)
+KZSD (8) +KBHE (9)	SD Bd Dir-ETV	+KZSD-TV (8) +KBHE-TV (9)
	Mission TV LLC	KEVN-TV (7) KIVV-TV (5)
	SJL Comm LP	KBJL (9)
	Young Bestg Inc	KCLO-TV (15)
	Rapid Bestg Corp	KNBN (21)
	Nebraska Educ Telecom	+KRNE-TV (12)
KEVN (7) KIVV (5)	Heritage Media	
KCLO (15)	Midcontinent Bestg	
KRBQ (7)	Dix Communications	

Market Ownership

1993

# of Stations:	# of Independent Owners:
9	5

2001

# of Stations:	# of Independent Owners:
11	7

Top 4 Local Commercial Share Owners

1993

Owner	Avg LCS
1. Duhamel Bestg	54%
2. Heritage Media	34%
3. Midcontinent Bestg	12%
4. n/a	n/a
TOTAL	100%

2001

Owner	Avg LCS
1. Duhamel Bestg	51%
2. Young Bestg Inc	18%
3. Rapid Bestg Corp	17%
4. Mission TV LLC	14%
TOTAL	100%

* Source: Investing in Television 1994, BIA Financial Network, Inc. (1st ed. 1994); Investing in Television 2001, BIA Financial Network, Inc. (3rd ed. 2001); Broadcasting & Cable Yearbook 1994, R.R. Bowker A Reed Reference Publishing Company. (Vol. 1. 1993); Broadcasting & Cable Yearbook 2001, Bowker. (2001).

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Attachment 4:

**Newspaper/Television Cross-Ownership
Chart**

Newspaper/TV Cross-Ownership

Location	Owner	Newspaper	TV	TV City/MKT	DMA Rank
New York, NY	News Corp.	NY Post	WNYW-TV	New York	1
Chicago, IL	Tribune B/C Co.	Tribune	WGN-TV (also owns WGN-AM)	Chicago	3
San Francisco, CA	Chronicle Publishing Inc.	SF Chronicle	KRON-TV	San Francisco	5
Dallas, TX	A.H. Belo	Dallas Morning News	WFAA-TV	Dallas	7
Atlanta, GA	Cox Enterprises Inc.	Atlanta Journal & Constitution	WSB-TV (also owns WSB-AM/WSB-FM)	Atlanta	10
Tampa, FL	Media General Inc.	Tampa Tribune	WFLA-TV	Tampa	13
Ft. Lauderdale, FL	Tribune B/C Co.	Ft. Lauderdale Sun Sentinel	WBZL-TV	Miami	18
Portland, OR	Lee Enterprises	Gresham Outlook/Sandy Post	KOIN-TV	Portland, OR	23
Cincinnati, OH	Scripps Howard	Cincinnati Post	WCPO-TV	Cincinnati	32
Milwaukee, WI	Journal B/C Group	Milwaukee Journal Sentinel	WTMJ-TV (also owns WTMJ-AM/WKTI-FM)	Milwaukee	33
Columbus, OH	Dispatch B/C Group	Columbus Dispatch	WBNS-TV (also owns WBNS-AM/WBNS-FM)	Columbus, OH	34
Stuart, FL	Scripps Howard	Stuart News	WPTV-TV	W. Palm Beach	43
Dayton, OH	Cox Enterprises Inc.	Dayton Daily News	WHIO-TV (also owns WHIO-AM/WHKO-FM)	Dayton	66
Texarkana, TX	WEHCO Media Inc.	Texarkana Gazette	KTAL-TV	Texarkana (Shreve)	75
Spokane, WA	Cowles Pub. Co.	Spokane Spokesman/Review	KHQ-TV	Spokane	78
Portland, ME	Guy Gannett Comm.	Portland Press Herald	WGME-TV	Portland, ME	80
South Bend, IN	Schurs Comm Inc	South Bend Tribune	WSBT-TV (also owns WSBT-AM/WNSN-FM)	South Bend	87
Cedar Rapids, IA	Cedar Rapids TV Co	Cedar Rapids Gazette	KCRG-TV (also owns KCRG-AM)	Cedar Rapids	90
Temple, TX	Channel 6 Inc.	Temple Daily Telegram	KCEN-TV	Temple (Waco)	94
Baton Rouge, LA	Manship Stations	Baton Rouge Morning Advocate	WBRZ-TV	Baton Rouge	97
Fargo, ND	Forum Publishing Co.	The Fargo Forum	WDAY-TV (also owns WDAY-AM)	Fargo-Valley City	120
Columbus, MS	Imes Comm. Group	Commercial Dispatch	WCBI-TV	Columbus, MS	132
Quincy, IL	Quincy Newspapers Inc.	Quincy Herald Whig	WGEM-TV (also owns WGEM-AM/WGEM-FM)	Quincy Hannibal	161
Idaho Falls, ID	The Post Co.	The Post Register	KIFI-TV	Idaho Falls	166

Attachment 5:

HHI Index

Attachment 5: Herfindahl-Hirschman Index (HHI) Chart for Radio and TV

	Radio HHI		TV HHI	
	1993	2001	1993	2001
New York, NY	531.69	1391.98	1611	1791
Los Angeles, CA	521.40	1408.45	1328	1636
Charlotte- Gastonia-Rock Hill	1596.93	3026.65	2471	2335
Birmingham, AL	1648.60	2917.32	2886	2396.11
Lexington-Fayette, KY	1994.17	3297.32	3024	2974
Tyler-Longview, TX	1460.46	2565.80	4878	4345
Portland, ME	1751.79	3126.91	2970	2570
Fargo, ND	1936.76	4249.68	2853	2681
Billings, MT	2784.18	3425.10	3768	3126
Rapid City, SD	2039.69	3695.85	4216	3410

Attachment 6:

**Statement of Jim Helenthal, Publisher of
the *Tri-State Shopper***

Quincy, Illinois

My name is Jim Helenthal and I operate an independent free weekly paper called the *Tri-State Shopper*. It is difficult enough to compete with a powerful daily newspaper but when that newspaper also owns both radio and television stations in the same market, that conglomerate virtually "owns" our city and can suppress competition at will, as I have experienced and will attempt to show.

Quincy is a city about 40,000 population in western Illinois on the Missouri border. One company, Quincy Newspapers Inc. (QNI) owns the only daily newspaper and radio and television stations in the market: WGEM TV (NBC), WGEM-AM radio, WGEM-FM radio, CGEM-TV (Fox), CGEM-TV Local Cable Access. Each one has its own internet web site. The daily newspaper, *Quincy Herald Whig*, also publishes *Quincy Merchant*, a total market coverage product. All outlets heavily cross-promote one another for both advertising and editorial content, offer combination deals involving all of their own media. The radio and TV stations consistently quote *Herald Whig* articles and interview *Herald Whig* news people on all subjects. In other words, Quincy is a near "closed corporation" for both competition and diversity, thanks to their control of all print and broadcast outlets.

Two advertising agencies, Media Development and Poole-Reed, work closely with QNI properties and place the overwhelming majority of all their print advertising in the *Herald Whig*. To cite just one example, every time Poole-Reed acquires an existing *Tri-State Shopper* account, it begins appearing in the *Herald Whig*. For instance, Jon's TV and Appliance ran a full-page ad every week in the *Tri-State Shopper* (\$1,100 a week) until the account was taken over by Poole-Reed, who immediately shifted it to the *Herald Whig*.

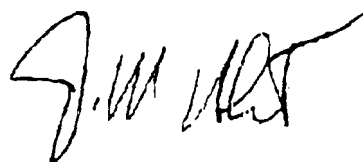
This "closed corporation" attitude is supported by the *Herald Whig* which is not averse to bringing pressure on advertisers to prevent their "straying" elsewhere. An example: Hy-Vee Stores was considering experimenting with the new *Tri-State Shopper* when a *Herald Whig* account rep told the manager that he is "obligated to support the community newspaper" and if he split his business, his ads with the *Herald Whig* would be charged at a higher rate. Another example: Niemann Foods Inc. (NFI) was also considering using the *Tri-State Shopper* until he was given around 3 full page ads per week, reportedly free of charge as a reward for remaining loyal to the *Herald Whig*. The director of Marketing for NFI told the *Tri-State Shopper* that the chances are that it would never get Niemann business due to a deal he couldn't talk about.

The Farm & Home Supply case: When the *Tri-State Shopper* prepared to begin publication, the daily newspaper then offered two total market coverage products, *Quincy Merchant* and *Wednesday Plus*, which advertisers found of little benefit. At that time, these two papers were combined into one *Quincy Merchant* product, circulation was increased from 13,500 to 40,000, better printing paper stock was used, full color was introduced, and other enhancements were added -- all to mount a knock-out punch to the fledgling new paper. Advertisers were surprised when they were told that their ads were being run in the new and expanded *Quincy Merchant* free of charge!

Farm & Home Supply came on board in the Tri-State Shopper in Spring 2001. It was valuable in more ways than one, because it is a locally-owned, key account that many smaller merchants look to for direction. To counter this defection, the Herald Whig sent Mary Oakley Winters (a family member), along with two other senior managers to call on Don Henke, general manager of Farm & Home Stores, asking him: "What is it going to take to get the Farm & Home preprint into the Merchant?" Henke told them: "We are happy with the Tri-State Shopper and are not interested in switching." Undeterred, the Herald Whig crew returned with an offer to run advertising at a special combination rate using both their print and broadcast media! A few weeks later, Don Henke called Jim Helenthal, publisher of the Tri-State Shopper, with the message: "Jim, I've got some bad news for you. The Herald Whig made us an offer we simply could not refuse. They gave us a package deal using TV, radio, newspaper, and the Merchant that is so incredibly cheap, we had to take it. I would not be acting in the best interest of Farm & Home to pass up this offer. We have no problem with you or your paper. In fact, the problem was, you were too good."

As a further example of market domination, in September, 2001, Thomas A. Oakley, Herald Whig Publisher and QNI President and CEO, was instrumental in the formation of a media group entitled, "The Unified Media for the Tri-States." Mr. Oakley brought into the group his daily newspaper, his TMC publication, the Merchant, his TV station, WGEM, and his two radio stations WGEM-AM and FM, along with the Hannibal *Courier Post*, KHQA-TV, the Star Radio group and others. The Tri-State Shopper was noticeably excluded from the meeting, nor was it invited to participate in the newly-formed group. The Herald Whig developed the print advertising campaign promoting the unified message, and Mr. Oakley arranged for WGEM-TV Creative Services to produce the broadcast version of the campaign. This blatant exclusionary behavior resulted from the power inherent in the ownership of a monopoly daily newspaper combined with co-ownership of radio and television outlets in the same market.

Local, independent entrepreneurs have great difficulty competing with large powerful daily newspapers. When these monopolies are combined with radio and/or TV in the same market, the power is escalated to the point that they can make any kind of deal to exclude or suppress competition from local, independent papers. Sometimes in the short run, price-cutting benefits a few advertisers, but these concessions are soon cancelled when the competition is eliminated. Allowing cross-ownership by monopoly newspapers of radio or television stations in the same market only expands the power of monopoly, endangers the very existence of smaller competitors, and does nothing for the public good.



Attachment 7:

**Statement of Phillip Daubel, Publisher of
the *Columbus (OH) Messenger***

Columbus, Ohio

My name is Phillip Daubel and I am publisher of the *Columbus Messenger*, community free newspapers of 162,149 circulation in the Columbus, Ohio suburbs.

As an independent local publication, we continually run up against the market power of the monopoly local daily newspaper, the *Columbus Dispatch*, which with its co-owned radio stations, WBNS-AM and WBNS-FM, and its television station, WBNS-TV, effectively dominate communications in the greater Columbus market. For example, tied in with their allied other interests in Columbus, we and other independent local papers, are usually excluded from any automotive advertising in this market. They "call their own tune" to our detriment. If the broadcasting outlets were separately owned, we at least would have a chance to compete on a fair basis. Cross-ownership for powerful daily newspapers of broadcast stations in our market has proved to be anti-competitive and hurtful to smaller independent operators such as us.

Phil Daubel

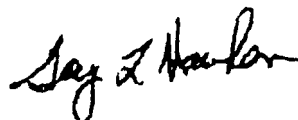
Attachment 8:

**Statement of Gary Hawken, Publisher of
(Stuart, FL) *Flashes Shopping Guide***

Stuart, Florida

My name is Gary Hawken, publisher of the *Flashes Shopping Guide*, a local free community paper in Stuart, Florida.

While we do not often collide head-on with special pressure from the Scripps Howard daily newspaper, the *Stuart News*, and its co-owned WPTV-TV station in nearby West Palm Beach, we are continually surrounded by the incessant cross-promotion of these two media, which tends to submerge and discredit our local paper. The problem is a growing bigness of media outlets, and the bigger they get with more outlets, the harder it is for smaller independents to compete.



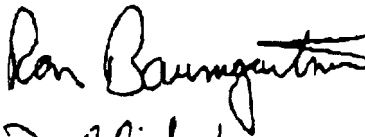
Attachment 9:

**Statement of Ron Baumgartner, Publisher
of (Milford, IN) *The Paper***

Milford, Indiana

My nme is Ron Baumgartner, publisher of The Paper, a local community paper in Milford, Indiana.

We already have difficulty competing with two monopoly daily papers in Goshen, Ind. and in Elkhart, Ind., where the company already owns the radio station WTRC-AM and FM. If the Federal Communications Commission opens the gates so these and other daily newspapers can also own local TV stations, it will only increase profits of the monopoly newspapers, it can do nothing to enhance competition and diversity in this area, and it will threaten our ability to provide an alternative choice for both news and advertising in our community.


Publisher

Attachment 10:

Regional Cable News Channel Ownership

Attachment 10: Regional Cable News Channel Ownership

	Regional Cable News Networks	Owner
1	New England Cable News (NECN)	Hearst Corporation and Media One
2	NorthWest Cable News	A.H. Belo
3	Chicagoland Television News (CLTN)	Tribune Company
4	News 12 New Jersey	Joint Venture of Cablevision and Advance Newhouse
5	New York 1 News	Time Warner
6	Bay TV	Chronicle Broadcasting Co-AT&T Broadband and Internet Services
7	NewsChannel 8	Albritton Communications
8	Florida's News Channel	Robert Brillante
9	Bay News 9	Time Warner
10	News 12 Long Island	Cablevision
11	Pittsburgh Cable News Channel (PCNC)	WPXI-TV, Cox Communications and AT&T Media Services
12	Texas Cable News	A.H. Belo Corp
13	MediaOne News	MediaOne
14	Orange County News Channel	Adelphia Communications
15	Ohio News Network	Dispatch Broadcast Group
16	Arizona News Channel	Cox Communications and KTVK-TV
17	Mas! Arizona	A.H. Belo and Cox Communications
18	Central Florida News 13 (CFN 13)	Time Warner and the Orlando Sentinel (a Tribune Company)
19	San Diego's News Channel 15	McGraw Hill and Cox Communications
20	Local News on Cable (LNC4)	A.H. Belo, Cox Communications and The Virginia Pilot
21	NewsChannel 5+	Landmark Communications
22	News Watch 15	A.H. Belo
23	Las Vegas ONE News	Landmark Communications, The Las Vegas Sun and Cox Communications
24	News 12 Westchester	Cablevision
25	News 8 Austin	Time Warner
26	News 12 The Bronx	Cablevision
27	News NOW 53	Cox Communications, Multimedia Cablevision and KWTV
28	News 12 Connecticut	Cablevision
29	Six News Now	The New York Times
30	News on One	Cox Communications and WOWT (TV)

CERTIFICATE OF SERVICE

I, David Chan, hereby certify that I have on this Third day of December, 2001, sent via U.S. Mail, postage prepaid, copies of the "Comments of the Office of Communication, Inc. of the United Church of Christ, National Organization for Women and Media Alliance" to the following:

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Federal Communications Commission
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Qualex International+
Portals II
445 Twelfth Street, S.W.
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Washington, D.C. 20554



David Chan

* Hand Delivery

+ Diskette Copy w/o Attachments